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Federal Communications Commission
Office of the Secretary

FCC MAIL SECTION

December 23, 1991

DEC 26 8 43 AM '91

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

ORIGINAL
FILE

RE: PETITION FOR RULE MAKING
RM-7869

Dear Mrs. Searcy:

Enclosed is the original and five (5), copies of my comments concerning RM-7869. I believe these are sufficient in quantity to ensure that each Commissioner receives a copy. Thank you for your consideration.

Respectfully submitted,


Roger A. Kepner

3214 E. Jackson Avenue
Orange, CA 92667-6313

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DEC 26 1991

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DEC 26 8 43 AM '91
Before the
Federal Communications Commission
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

In the matter of: >
Amendment to Part 97 of the >
Commission's Rules Governing >
Amateur Radio Services >
Regarding repeater and >
Auxiliary Operation in the >
1.25 meter Band. >

RM-7869

To: The Commission

PETITION FOR RULE MAKING

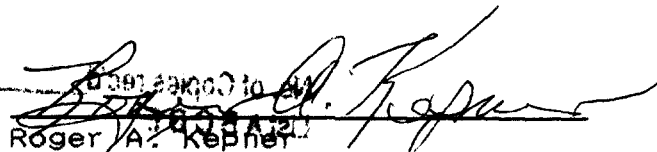
I, Roger A. Kepner, W6SQQ, hereby respectfully submit my request to the Federal Communications Commission to refrain from taking action on the Petition For Rule Making, RM-7869, submitted by the American Radio Relay League.

The reasons for my request are listed below:

1. In the greater Los Angeles area there are seventeen repeaters currently active with input frequencies in the 222.000 MHz. to 222.150 MHz. portion of the 1.25 meter amateur band. The system that my wife, Carole Kepner, KB6IIT, and I support is coordinated on the 222.080 MHz./222.680MHz. frequency pair. There are 150 users of this repeater within our club membership that would be displaced by RM-7869.
2. I estimate, based on club memberships, that there are well over 1,000 additional licensed amateurs utilizing the other 16 repeaters. These amateurs would also be displaced by RM-7869.

3. Those amateurs in this area benefiting from the Petition submitted by the American Radio Relay League are a scant handful by comparison, numbering perhaps a dozen.
4. The frequency coordinating body for the 1.25 Meter band in Southern California, the 220 Spectrum Management Association devised a band plan for the Southern California area that was discussed in open session, voted on, and passed by an overwhelming majority of the membership of the Association. The band plan provides sufficient spectrum for EME and moonbounce work, particularly when the latest communications techniques and technical innovations in equipment are taken into consideration.
5. It has been the policy of the American Radio Relay League in the past to defer to the accepted local frequency coordinating bodies in matters concerning essentially local issues. The League's Petition seems to be contradictory to its past position. I believe that the League was ill advised in this matter and will eventually withdraw the Petition at the request of a large portion of the League's membership.

Respectfully Submitted,
December 23, 1991


Roger A. Kepner
9214 E. Jackson Avenue
Orange, CA 92667